

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA)	Cr. No.: <u>1:22-cr-117-JL-01</u>
)	
vs.)	18 U.S.C. § 2251(a) & (e)
)	18 U.S.C. § 1591(a)(1), (b)(2), & (c)
JOHN E. MURRAY, III)	
)	

INDICTMENT

The Grand Jury charges:

At all times relevant to this indictment:

INTRODUCTION AND BACKGROUND

1. The West Alton Marina is a Delaware limited liability company located on Alton Bay in New Hampshire. It is a full-service marina with over 250 rental slips, boat and trailer parking areas, two bathhouses, gas docks, a convenience store, a winter boat-storage building, a warehouse, a service and parts building, a commercial boat operation area, and a storage barn.

The marina services customers from New Hampshire, Massachusetts, and other states.

2. John E. MURRAY, III, was a manager at the West Alton Marina. Among other tasks, MURRAY was responsible for hiring and supervising seasonal employees of the marina, many of whom were minors under the age of 18. MURRAY closely managed the day-to-day activities of minor employees and formed close personal relationships with several of them. Seasonal employees were hired to work during the marina's busy summer season, which lasts from approximately the end of May to the beginning of September. Each year, the marina employs approximately 10 to 20 seasonal employees.

3. MURRAY solicited numerous minor employees to create sexually explicit images and/or videos of themselves and to send them to MURRAY via text or via the online social media

platform Snapchat. In particular, MURRAY solicited minor employees to take images and/or videos of themselves masturbating—and specifically, ejaculating—often in exchange for cash.

4. MURRAY subjected numerous minor employees to unwanted sexual contact and sexual acts, to include MURRAY fondling the genitals of and performing oral sex on minor employees, in some instances, in exchange for cash.

5. John Doe 1 was a minor under the age of 18. John Doe 1 was hired as an employee at the West Alton Marina beginning in or about April 2021. MURRAY hired John Doe 1 and was John Doe 1's direct supervisor at the West Alton Marina.

6. John Doe 2 was a minor under the age of 18. John Doe 2 was hired as an employee at the West Alton Marina beginning in or about June 2019. MURRAY hired John Doe 2 and was John Doe 2's direct supervisor at the West Alton Marina.

7. John Doe 3 was a minor under the age of 18. John Doe 3 was hired as an employee at the West Alton Marina beginning in May 2016. MURRAY hired John Doe 3 and was John Doe 3's direct supervisor at the West Alton Marina.

8. John Doe 4 was a minor under the age of 18. John Doe 4 was hired as an employee at the West Alton Marina beginning in or about the summer of 2018. MURRAY hired John Doe 4 and was John Doe 4's direct supervisor at the West Alton Marina.

9. John Doe 5 was a minor under the age of 18. John Doe 5 was hired as an employee at the West Alton Marina beginning in or about the summer of 2015. MURRAY hired John Doe 5 and was John Doe 5's direct supervisor at the West Alton Marina.

COUNTS 1-3

(Production of Child Pornography – 18 U.S.C. §§ 2251(a) & (e))

10. Paragraphs 1-5 are re-alleged.

11. On or about the dates set forth below, in the District of New Hampshire, the defendant,

JOHN E. MURRAY, III,

knowingly employed, used, persuaded, induced, enticed, and coerced John Doe 1, a minor, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and knowing that such visual depiction would be mailed or transported in interstate and foreign commerce, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251 (a) and (e).

Count 1	May 21, 2021
Count 2	June 18, 2021
Count 3	August 3, 2021

The Grand Jury charges further:

COUNTS 4-6

(Production of Child Pornography – 18 U.S.C. §§ 2251(a) & (e))

12. Paragraphs 1-4 and paragraph 6 are re-alleged.

13. On or about the dates set forth below, in the District of New Hampshire, the defendant,

JOHN E. MURRAY, III,

knowingly employed, used, persuaded, induced, enticed, and coerced John Doe 2, a minor, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and knowing that such visual

depiction would be mailed or transported in interstate and foreign commerce, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251 (a) and (e).

Count 4	November 24, 2020
Count 5	January 27, 2021
Count 6	June 8, 2021

The Grand Jury charges further:

COUNTS 7-9

(Production of Child Pornography – 18 U.S.C. §§ 2251(a) & (e))

14. Paragraphs 1-4 and paragraph 7 are re-alleged.

15. On or about the dates set forth below, in the District of New Hampshire, the defendant,

JOHN E. MURRAY, III,

knowingly employed, used, persuaded, induced, enticed, and coerced John Doe 3, a minor, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and knowing that such visual depiction would be mailed or transported in interstate and foreign commerce, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251 (a) and (e).

Count 7	July 19, 2018
Count 8	September 4, 2018
Count 9	October 17, 2018

The Grand Jury charges further:

COUNTS 10-12

(Production of Child Pornography – 18 U.S.C. §§ 2251(a) & (e))

16. Paragraphs 1-4 and paragraph 8 are re-alleged.
17. On or about the dates set forth below, in the District of New Hampshire, the defendant,

JOHN E. MURRAY, III,

knowingly employed, used, persuaded, induced, enticed, and coerced John Doe 4, a minor, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and attempted to do so, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and knowing that such visual depiction would be mailed or transported in interstate and foreign commerce, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251 (a) and (e).

Count 10	July 30, 2018
Count 11	September 15, 2018
Count 12	November 7, 2018

The Grand Jury charges further:

COUNTS 13-15

(Sex Trafficking of a Minor – 18 U.S.C. § 1591(a)(1), (b)(2), and (c))

18. Paragraphs 1-4 and paragraph 9 are re-alleged.

19. During the time periods set forth below, in the District of New Hampshire, the defendant,

JOHN E. MURRAY, III,

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, provide, obtain, patronize, and solicit by any means, John Doe 5, who was under 18 years of age, knowing and in reckless disregard of the fact that John Doe 5 was under 18 years of age and would be caused to engage in a commercial sex act. Murray recruited, enticed, patronized, and solicited John Doe 5, whom he supervised, to engage in sex acts in exchange for cash payments. All in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

Count 13	Beginning in or about June 2015 and continuing until in or about August 2015
Count 14	Beginning in or about June 2016 and continuing until in or about August 2016
Count 15	Beginning in or about June 2017 and continuing until in or about August 2017

COUNT 16

(Sex Trafficking of a Minor – 18 U.S.C. § 1591(a)(1), (b)(2), and (c))

20. Paragraphs 1-4 and paragraph 6 are re-alleged.

21. Beginning in or about July 2020, and continuing through in or about December 2020, in the District of New Hampshire, the defendant,

JOHN E. MURRAY, III,

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, provide, obtain, patronize, and solicit by any means, John Doe 2, who was under 18 years of age, knowing and in reckless disregard of the fact that John Doe 2 was under 18 years of age and would be caused to engage in a commercial sex act. Murray recruited, enticed, patronized, and

solicited John Doe 2, whom he supervised, to engage in sex acts in exchange for cash payments.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

NOTICE OF FORFEITURE

Upon conviction of one or more of the offenses alleged in Counts One through Twelve of this Indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 2253(a)(2) and (3), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the charged offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the charged offenses, including but not limited to the following: (A) one Apple iPhone Model 6; (B) one Apple iPhone Model 12; (C) one Apple iPad Pro (9.7 inch); one Lenovo computer; one HP laptop computer 350G2.

Upon conviction of one or more of the offenses alleged in Counts Thirteen through Sixteen of this Indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 1594(d)(1) and (2), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the charged offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the charged offenses, including but not limited to the following: (A) one Apple iPhone Model 6; (B) one Apple iPhone Model 12; (C) one Apple iPad Pro (9.7 inch); one Lenovo computer; one HP laptop computer 350G2.

TRUE BILL

Dated: October 24, 2022

/s/ Foreperson _____
Grand Jury Foreperson

JANE E. YOUNG
United States Attorney

/s/ Kasey A. Weiland _____
Kasey A. Weiland
Assistant U.S. Attorney